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Attorneys for Plaintiff

13 CANDY TORRES, } No. 2:19-cv-00594-APG-EJY
14 Plaintiff, }
15 vs. } STIPULATION PERMITTING
16 ALLAN ROTHSTEIN and KYLE } PARTIES UNTIL JULY 12, 2022, TO
PUNTNEY, } FILE LIMINE MOTIONS;
17 Defendants. } [PROPOSED] ORDER
18 Trial: August 8, 2022 }

20 The parties hereby stipulate to issuance of an order permitting them until
21 Tuesday, July 12, 2022, to file limine motions in connection with the trial of this
22 action. A proposed order is appears at the end of this stipulation.

23 There is good cause to grant this joint request for the following reasons:

24 First, this request is timely since it seeks to extend a deadline before its
25 expiration.

26 Second, under the current scheduling order (ECF176), this action is set for a
27 bench trial starting on August 8, 2022.

28 Third, under LR 16-3(a), “[u]nless the court orders otherwise, motions in

1 limine must be filed 30 days before trial," making limine motions due on Saturday,
2 July 9, 2022.

3 Fourth, before filing limine motions the parties must confer in an effort to
4 avoid or limit the need for those motions. Andrew Wasielewski, attorney for
5 defendant Allan Rothstein, is unavailable to confer until Monday afternoon, July
6 11, a date after the current LR 16-3 filing deadline.

7 Accordingly, to comply with LR 16-3's conference requirement, there is
8 good cause for this short extension of the deadline for filing limine motions.

9 So stipulated.

10 Dated: July 7, 2022. Respectfully submitted,

11
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21 Attorneys for Plaintiff

22
23 [PROPOSED] ORDER

24 The parties shall have until July 12, 2022, to file their limine motions.

25 Dated: July 8, 2022.

26
27 
Hon. Andrew P. Gordon
United States District Judge

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CERTIFICATE OF SERVICE

Pursuant to Rule 5 of the Federal Rules of Civil Procedure, on July 8, 2022, I served email via ECF a copy of the attached document **STIPULATION PERMITTING PARTIES UNTIL JULY 12, 2022, TO FILE LIMINE MOTIONS; [PROPOSED] ORDER** – on the following persons:

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/s/ Christopher Brancart